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11 Attorneys for Defendant,  
Professional Collection Consultants  
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13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
15 WESTERN DIVISION  
16

17 WESTERN WORLD INSURANCE  
COMPANY,

18 Plaintiff,

19 v.

20 PROFESSIONAL COLLECTION  
CONSULTANTS,

21 Defendant.  
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23  
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Case No. 2:15-cv-02342 MWF (VBKx)

**DECLARATION OF DAVID W.  
WIECHERT REGARDING  
REQUEST TO PERMIT UNDER  
SEAL FILING RELATING TO  
SUMMARY JUDGMENT MOTION**

Date: March 21, 2016  
Time: 10:00 a.m.  
Ctrm: 1600

Judge: Hon. Michael W. Fitzgerald  
Trial Date: November 15, 2016  
Complaint Filed: March 30, 2015

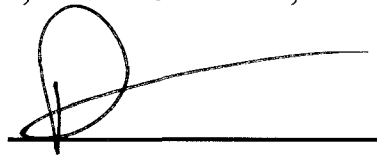
**DECLARATION OF DAVID W. WIECHERT**

I, David W. Wiechert, declare as follows:

1. I am an attorney licensed to practice before all courts in the State of California and the United States District Court for the Central District of California, and my practice, the Law Offices of David W. Wiechert, has been associated in as co-counsel for Defendant Professional Collection Consultants ("PCC"). The following is based on my personal knowledge and if called as a witness, I could and would testify competently thereto.

2. This Declaration is in support of the court permitting the concurrently filed Declaration of David W. Wiechert to be filed under seal. The information contained therein is highly confidential and if publicly disclosed could have a significant impact on the reputation or business of PCC. The proposed under seal declaration will be served on Plaintiff and the information disclosed therein has been shared with Plaintiff's counsel on March 11, 2016.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed, in San Clemente, California on March 13, 2016.

A handwritten signature in black ink, appearing to be 'D. Wiechert', written over a horizontal line.

DAVID W. WIECHERT

**CERTIFICATE OF SERVICE**

I, Danielle Dragotta, an employee of the Law Office of David W. Wiechert, located at 115 Avenida Miramar, San Clemente, California 92672, declare under penalty and perjury that I am over the age of eighteen (18) and not a party to the above-entitled proceeding.

On March 14, 2016, I served the forgoing documents, described as **DECLARATION OF DAVID W. WIECHERT REGARDING REQUEST TO PERMIT UNDER SEAL FILING TO SUMMARY JUDGMENT MOTION** on all interested parties as follows:

☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at San Clemente, California with postage thereon fully prepaid to the office of the addressee(s) as indicated on the attached service list. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☒ **BY E-MAIL:** I caused a copy to be transmitted electronically by filing the foregoing with the clerk of the District Court using its ECF system, which electronically notifies counsel for that party.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 14, 2016, at San Clemente, California.

  
Danielle Dragotta